

EXHIBIT 1

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DECLARATION OF ROY E. MILLER

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3 I, ROY MILLER, say and declare as follows:

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5 1. I am an individual over 18 years of age and competent to make this Declaration.

6 2. If called upon to do so, I could and would competently testify as to the facts set forth in
this Declaration.

7 3. The facts set forth below are true of my personal knowledge.

8 4. I am an attorney at law duly admitted to practice before this Court and courts of the
9 State of California.

10 5. I am an attorney with the law firm of Hansen & Miller, attorneys of record for
11 thousands of victims of the fires started by PG&E in 2017 (the twenty fires generally referred to
12 as the “North Bay”), 2018 (“Camp Fire”) and 2019 (“Kincade Fire”).

13 6. I make this Declaration in support of the motion to allow late filing of proofs of claim
14 (“Motion”) on behalf of Gene Hawley and Joan Hawley (collectively “Movants”), whom lost
15 their respective homes in the Tubbs Fire. Gene Hawley and Joan Hawley are jointly represented
16 by Hansen & Miller and Watts Guerra LLP.

17 7. These clients did not have a claim filed before the December 31, 2019 claims bar date
18 due to excusable neglect and should be allowed to file a proof of claim after the bar date.

19 8. Gene and Joan Hawley lost their home in the Tubbs Fire. They came to a townhall
20 meeting at my law firm’s Santa Rosa office in September 2019 and took paper work home to sign
21 up for a claim. The Hawley’s believe they returned the fee agreement and other paper work for
22 signing up as a client before the December 31, 2019 deadline. Thus the Hawley’s believe they
23 accomplished everything necessary to have a claim filed prior to the deadline. However, no one at
24 Hansen & Miller recalls their paperwork ever being provided. Hansen & Miller sent its clients
25 regular update letters and twice searched the entire office before the December 31, 2019 deadline
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to ensure all clients had their claims filed. On April 23, 2020, the Hawley's contacted Hansen & Miller to inquire about their claim. Hansen & Miller, searched their offices, their databases, and all other avenues to locate the Hawley's fee agreement. In the end, it was determined that the Hawley's believed they had acted timely in returning their contract and supporting documentation to our offices but in three different contact instances, Hansen & Miller could not locate any documentation for the Hawleys.

9. On May 26, 2020, Watts Guerra LLP filed claim numbers UEBNK27402 and D@A@F27402 on behalf of the Movants (“Subject Proofs of Claims”). True and correct copies of the Subject Proofs of Claims are attached collectively hereto as Exhibit A.

I declare under penalty of perjury under the laws of the State of California that the forgoing is true and correct and executed this 26th day of May 2020.

/s/ Roy Miller
Roy Miller